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Jeffrey M. Nelson Chief Legal Officer

December 10, 2018

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

RE:

Application of Duke Energy Carolinas LLC for Approval of Proposed Electric Transportation Pilot and An Accounting Order to Defer Capital and Operating Expenses

Docket No. 2018-321-E

Application of Duke Energy Progress, LLC for Approval of Proposed Electric Transportation Pilot and An Accounting Order to Defer Capital and Operating Expenses

Docket No. 2018-322-E

Dear Ms. Boyd:

On November 27, 2018, the Public Service Commission of South Carolina ("Commission") issued directive orders 2018-179-H and 2018-181-H, which granted the South Carolina Office of Regulatory Staff ("ORS") additional time to file comments in the above Dockets. Please allow this letter to serve as ORS's comments in these Dockets.

ORS continues to review Duke Energy Progress, LLC and Duke Energy Carolinas, LLC ("Companies") proposed electric transportation pilot programs. ORS acknowledges the many positive aspects of the Companies' proposed pilot programs and has discussed these merits with other interested parties.

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Due to the unique and complex nature of the pilot programs, ORS recommends the Commission hold the Companies' comment period and any further action in these Dockets in abeyance to allow ORS an opportunity to facilitate a stakeholder process. This will enable a collaborative review of the proposals with the Companies and interested stakeholders with the goal of clarifying questions and building consensus around viable pilot programs that will deliver value.

The stakeholder process will include a Technical Workshop to be facilitated by ORS on or before January 30, 2019. A report will be filed with the Commission on or before March 1, 2019 outlining areas of consensus and identifying issues in dispute, if any, for Commission consideration. The report will also consider and recommend procedural next steps for the requests in these Dockets. ORS recommends the following timeline for the stakeholder process:

- ORS will provide an agenda to stakeholders on or before December 21, 2018 to establish the goals of the group and ensure an efficient and meaningful discussion.
- Stakeholders may submit comments and questions relating to the agenda by January 10, 2019. Comments and questions should be submitted to ORS.
- ORS will facilitate a Technical Workshop on or before January 30, 2019. The Companies will consider changes to the pilot programs after the Technical Workshop and have committed to sending revisions to the stakeholder group for review and comments.
- ORS will facilitate a meeting to provide an update on the status of any revisions to the pilot programs on or before February 22, 2019.
- A report will be filed on or before March 1, 2019 for Commission consideration.

ORS has discussed this approach with the Companies, and the Companies support this request.

If you have any questions, please do not hesitate to contact me.

Sincerely,

effrey M. Nelson

cc: All Parties of Record (via E-mail)